

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

C.A. No.:

DECLARATION OF CHANEL COMPTON

Pursuant to 28 U.S.C. § 1746, I, Chanel Compton, hereby declare as follows:

1. I am a resident of Maryland. I am over the age of 18 and have personal knowledge of all the facts stated herein, except as to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. Since 2017, I have served as the Executive Director of the Maryland Commission on African American History & Culture (“Commission”), which has existed since 1969 as the statewide clearinghouse for the preservation and documentation of the African American experience in Maryland. The Commission assists research and collects historical materials—e.g., art objects, memorabilia, manuscripts, photographs—of significance to African American history and culture. The Commission also provides exhibits, programs, and resource materials for the community at large and for educational systems and institutions within the State.

3. In addition, the Commission operates the Banneker-Douglass-Tubman Museum (“Museum”) located in Annapolis, Maryland. As the State of Maryland’s official museum of African American heritage, the Museum serves to document, interpret, and promote African American history and culture (particularly in Maryland) through exhibitions, programs, and projects to improve the understanding and appreciation of America’s rich cultural diversity for all. In partnership with Maryland Historical Trust, the Commission co-administers the African American Heritage Preservation Grant Program, which annually awards capital grants to fund the restoration and preservation needs of African American heritage sites, such as historic homes, churches, cemeteries, and museums throughout Maryland.

4. The Banneker-Douglass-Tubman Museum Foundation, Inc. (“Foundation”) is a private, non-profit 501(c)(3) corporation, created, and operated for the benefit of the Museum. The Foundation was established in March of 1976 to support the Commission in establishing and maintaining the Museum as the State of Maryland’s repository of African American History and Culture.

5. As Executive Director, I oversee the operations of the Commission, the Museum, and the Foundation, including applying for and administering grant funding to support the institutions’ missions.

6. I submit this declaration in connection with Executive Order 14,238, “Continuing the Reduction of the Federal Bureaucracy,” which directed seven federal agencies, including the Institute for Museum and Library Services (“IMLS”), to “eliminate[]” any “non-statutory components and functions . . . to the maximum extent consistent with applicable law,” and to “reduce the performance of their statutory functions and associated personnel to the minimum presence and function required by law.” Exec. Order 14,238 § 2(a).

7. It is my understanding that, in response to Executive Order 14,238, the IMLS has begun implementing plans to significantly reduce its staff, including those employees who administer IMLS grant programs.

8. Given my experience, I believe that the terminations of IMLS staff under Executive Order 14,238 will render the agency unable to administer financial awards and/or programs on which the Museum and the Commission rely and on which they expect to rely in the future, causing significant harm to the Museum and the Commission.

9. The Museum is currently scheduled to receive \$100,000 through IMLS grant No. MH-255727-OMS-24, which was awarded to the Foundation on May 10, 2024. The grant, which runs from July 1, 2024, to June 30, 2027, was issued under Assistance Listing Number 45.309, which covers Museum Grants for African American History and Culture.

10. The grant was awarded to support the Museum's effort to identify, repatriate, and reinter 13 sets of African Americans human remains that had been discovered throughout Maryland during construction and archeological investigations and were preserved for many years in the Maryland Archaeological Conservation Laboratory ("MAC Lab"). The MAC Lab is the State Museum of Archaeology; it is a state-of-the-art archaeological research, conservation, and curation facility located at Jefferson Patterson Park & Museum ("JPPM") in Calvert County, Maryland. Both JPPM and the MAC Lab are part of the Maryland Historical Trust, which is situated within the Maryland Department of Planning.

11. The grant-funded "African Ancestral Human Remains Project" aims to identify lineal descendants or culturally affiliated communities connected to individuals of African descent who lived during Maryland's slave-holding era. The remains were discovered through various circumstances, including construction projects, a bulldozing operation, and formal archaeological

investigations. The project involves research into the origin of the human remains and their connection to existing communities, DNA testing, and reinterment, with facial reconstruction of the reinterred individuals envisioned for a subsequent project. The project serves dual purposes: to facilitate the dignified reinterment of ancestral remains in culturally appropriate cemeteries or churchyards, and to document and research these individuals' lives to enhance our collective understanding of Maryland's complex historical narrative. By combining archaeological expertise, genealogical research, and community engagement, the Project addresses a significant gap in documented history while honoring cultural traditions and acknowledging the contributions of these individuals to Maryland's development, ultimately creating a more inclusive historical record that illuminates previously marginalized narratives for scholars, educators, and the public alike. A university research fellow will assist in creating a local history research report, which will be made accessible online for a public audience.

12. The Project involves considerable public outreach. We have already held five meetings with communities throughout Maryland to describe the Project and solicit their assistance in locating existing African American communities that are culturally affiliated with the individuals whose remains are to be reinterred. The Project team will continue to invite descendants and interested communities to associated programming and will lead public workshops on how to conduct genealogical research.

13. The Commission's budgets for fiscal years 2025 (ending on July 1, 2025) and 2026 were formulated in reliance on the \$100,000 IMLS grant, and I, as Executive Director, made plans and allocated funding for staff and other Museum-related projects based on the anticipated receipt of the awarded IMLS grant funding.

14. We have already incurred significant costs under the Project, and I anticipate we will begin to draw down the grant award in April 2025. Over the next three months, I expect to draw down \$20,000 under our current IMLS award, with the remainder to be disbursed as we incur the hard expenses associated with the research, DNA analysis, and reinterment phases of the Project.

15. Any pause in our IMLS funding will jeopardize the viability of the Project. If those grant funds are delayed or cancelled, I foresee not being able to carry out several aspects of the Project, including research, DNA testing, and reinterment, all of which involve expenses that have not otherwise been budgeted. Given the extraordinarily tight budgetary situation in Maryland and elsewhere, I am confident that other sources of funding will not be forthcoming. And without adequate resources, we face the immediate risk of halting ongoing repatriation efforts for the human remains and forgoing research into the deceased individuals themselves, whose lives tell an important story of Maryland history.

16. The uncertainty surrounding the IMLS funding has already begun to compromise the Project. We designed the project schedule to allow time to procure the DNA analysis that is an important part of the Project. Because we will not be able to pay for these aspects of the Project if the IMLS funding is cancelled or significantly delayed, we have had to hold off on arranging those services. That uncertainty thus compromises our ability to complete the Project by its July 1, 2027 end date.

17. In addition to the one current IMLS grant, the Museum has previously received other types of grant funding from IMLS. In 2019, the Museum (when it was known by its former name, the “Banneker-Douglass Museum”) received a \$50,000 Museum Grant for African American History and Culture from the IMLS to build the capacity of African American museums

and support the growth of museum professionals. The grant was used to upgrade the Museum's collections room by installing museum shelving units for larger artifacts and our fine art collection and to make upgrades to our research areas. The project represented a significant improvement to our collections and preservation practices, and it made our facility more accessible to researchers, staff, and the public.

18. Amid increasing budget pressures, the Museum, like libraries and museums nationwide, is urgently seeking committed funding sources to sustain our innovative and community-based approach to research and educational services. The IMLS is an important part of that effort, and I fully expect that the Commission will seek IMLS grant-funding in the future.

19. I have a Master's Degree in Arts Management and have spent my entire professional career in the museum field, as the Executive Director of the Commission and, before that, as the Executive Director of the Prince George's African American Museum and Cultural Center, the Director of Education at the Creative Alliance at the Patterson, and a Project Coordinator with the Smithsonian National Museum of African Art. My experience in the field has shown me the critical importance of the IMLS as a resource for museums, public and private alike. Through IMLS funding, our agency will continue to execute critical projects that will significantly enhance our research capabilities and educational offerings, ultimately strengthening our service to diverse communities across Maryland. More generally, a loss of IMLS funding would drastically reduce or eliminate educational programs that bring these types of important historical narratives to other universities, museums, and community groups in Maryland, while technological infrastructure for digital preservation and access would deteriorate. The museum field as we know it would not be possible without the guidance, collaboration, and financial support that the IMLS has traditionally provided.

20. The support of the IMLS is particularly valuable for museums, like the Banneker-Douglass-Tubman Museum, whose collections curate and explore cultural and historical artifacts related to Americans who have historically been underrepresented in the collections and offerings of mainstream museums. To paraphrase the Reverend Martin Luther King Jr., museums that focus on the lives and legacies of African Americans “have come a long, long way, but we have a long, long way to go.” The IMLS is an indispensable partner on that journey.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on April 2, 2025, at Annapolis, Maryland.


CHANEL COMPTON